
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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|------------------|---|----------------------|
| In Re: |) | Case No: 15-18704 |
| Scott M Rehfeldt |) | |
| |) | Chapter 13 |
| |) | |
| Debtor(s). |) | Judge: Janet S. Baer |

NOTICE OF MOTION

TO: Scott M Rehfeldt, 4003 Mt Gallant Rd. Rock Hill, SC 29732 *via US mail*
Trustee Glenn B Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532 *via ECF clerk's electronic delivery system*
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*
See attached service list

PLEASE TAKE NOTICE that on **March 15, 2019 at 9:30 a.m.**, I shall appear before the Honorable Judge Janet S. Baer at Kane Courthouse, 100 S 3rd Street, Courtroom 240, Geneva, Illinois 60134 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on February 12, 2019 before the hour of 9:00 p.m. from the office located at 4131 Main Street., Skokie, Illinois 60076.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Scott M Rehfeldt, by and through his attorneys, the law office of CUTLER & ASSOCIATES, and in support of this Motion, states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on May 28, 2015.
3. The Debtor's plan was confirmed on October 9, 2015.
4. The Debtor's Plan was confirmed with a payment of \$160 for 4 months and then \$195 for 56 months with unsecured creditors receiving at least 10% of their unsecured claims.
5. The Debtor has a new job where his income has increased and his disposable monthly income is \$893 a month.
6. The Debtor seeks to modify his plan post confirmation to increase his plan payment to \$893 a month commencing with the March 2019 plan payment.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation to increase his plan payment to \$893 a month commencing with the March 2019 plan payment; and for such further relief that this Court may deem just and proper.

Dated: February 12, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600